

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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STEVEN UMBRIA,	:	CIVIL ACTION
	:	
Plaintiff,	:	Case No. 2:21-cv-01718-ER
v.	:	
VALLEY FORGE CASINO RESORT	:	<i>Hon. Eduardo C. Robreno</i>
and	:	
BOYD GAMING CORPORATION,	:	
Defendants.	:	
	:	

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**DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

Defendants Valley Forge Casino Resort and Boyd Gaming Corporation (“Defendants”), by their undersigned attorneys, hereby submit this motion for summary judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure (the “Motion”) as to all claims brought by Steven Umbria (“Plaintiff”). Plaintiff cannot establish the *prima facie* elements of his claims, nor can he demonstrate that Defendants’ legitimate, non-discriminatory reasons for his position elimination were false or that the true reason was discrimination. The facts, grounds, authority, and arguments supporting the Motion are set forth in the accompanying Brief in Support of Defendants’ Motion for Summary Judgment and its exhibits. Such facts, grounds, authority, and arguments are incorporated by reference and are a part of the Motion.

For the reasons set forth therein, Defendants respectfully request that this Court grant summary judgment in their favor as to all Plaintiff’s claims against Defendants.

Respectfully submitted,

/s/ Jacqueline R. Barrett

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Dated: December 10, 2021

*Attorneys for Defendants*

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I hereby certify that on December 10, 2021, a copy of the foregoing Motion for Summary Judgment, Brief in Support, and Exhibits were electronically filed with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

By: /s/ Jacqueline R. Barrett  
Jacqueline R. Barrett